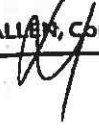




**IN THE DISTRICT COURT IN AND FOR PAYNE COUNTY
STATE OF OKLAHOMA**

IN THE DISTRICT COURT OF
Payne County, Oklahoma
Filed

MAY 30 2018

LORI ALLEN, Court Clerk
By:  Deputy

TYLER GORDON FERRELL,

)

Plaintiff,

)

v.

) CJ-2018- 276

EZPAWN OKLAHOMA, INC.,

)

Defendant.

)

PETITION

Comes now Plaintiff, Tyler Gordon Ferrell, Pro Se and for his Causes of Action against Defendant,
EZPawn Oklahoma, Inc., alleges and states the following:

PARTIES AND JURISDICTION

1. Plaintiff is a citizen of Oklahoma residing in Noble County, Oklahoma.
2. Defendant is a business entity incorporated under the laws of the State of Delaware doing business in various counties including Payne County, Oklahoma.
3. This action arises due to Defendant's violation of Plaintiff's rights guaranteed under Title VII of the Civil Rights Act of 1964 and the Civil Rights Act of 1991, 29 U.S.C. section 621 et seq, and the Americans with Disabilities Act of 1990 as amended and retaliation for complaining of protected activity.

GENERAL FACTS

4. Plaintiff is a thirty six year old male.
5. Plaintiff began employment with Defendant on or about August 31, 2015.

EXHIBIT

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6. Plaintiff is a disabled military veteran with a sixty percent disability rating by the Veteran's Administration on the date Plaintiff was hired by Defendant. This rating was increased to ninety percent on September 1, 2016.
7. Defendant terminated Plaintiff on February 25, 2017.
8. Plaintiff was thirty four years old at the time of his termination.
9. At all times, Defendant's employees, supervisors and agents were acting within the scope of their employment. Defendant knew or should have known of the acts of its representatives, discriminated against Plaintiff because of his age, sex, physical impairment and for reporting violations of the law and wrongfully terminated Plaintiff.
10. Plaintiff timely filed a Charge of Discrimination with the Equal Employment Opportunity Commission on February 16, 2017 alleging disparate treatment and disparate impact pursuant to Title VII of the Civil Rights Act, the Age Discrimination in Employment Act and the Americans with Disabilities Act of 1990
11. Plaintiff was issued a Notice of Right to Sue on March 8, 2018, which is more than 180 days after the filing of the Equal Employment Opportunity Commission Charge of Discrimination. Plaintiff has exhausted his administrative remedies.

FIRST CAUSE OF ACTION GENDER DISCRIMINATION

Paragraphs 1-11 are incorporated by reference.

12. As a result of Defendant's discriminatory actions, Plaintiff has suffered the effects of gender discrimination which is a violation of Title VII of the Civil Rights Act of 1964, and the Civil Rights Act of 1991, 42 U.S.C. section 2000(e) et seq. and has lost wages and benefits including future wages and benefits.

13. The Actions of Defendant, through its representatives, caused Plaintiff to suffer emotional distress, humiliation and embarrassment. Defendant's actions were intentional and willful and without regard for the rights of Plaintiff and others similarly situated.
14. Plaintiff is entitled to an award of back pay, compensatory damages, exemplary damages, pre-judgment interest and costs.

SECOND CAUSE OF ACTION AGE DISCRIMINATION

Paragraphs 1-14 are incorporated by reference.

15. As a result of Defendant's discriminatory actions, Plaintiff has suffered the effects of age discrimination which is a violation of the Age Discrimination in Employment Act, 29 U.S.C. section 621 et. seq and has lost wages and other benefits of employment.
16. The Actions of Defendant, through its representatives, caused Plaintiff to suffer emotional distress, humiliation and embarrassment. Defendant's actions were intentional and willful and without regard for the rights of Plaintiff and others similarly situated.
17. Plaintiff is entitled to an award of back pay, compensatory damages, exemplary damages, pre-judgment interest and costs.

THIRD CAUSE OF ACTION 'AMERICANS WITH DISABILITIES ACT AND UNIFORMED SERVICES EMPLOYMENT AND REEMPLOYMENT RIGHTS ACT

Paragraphs 1-17 are incorporated by reference.

18. As a result of Defendant's discriminatory actions Plaintiff suffered the effects of Discrimination on account of having a physical impairment which is a violation of the Americans with Disabilities Act and the Uniform Services Employment and Reemployment Rights Act.
19. The Actions of Defendant, through its representatives, caused Plaintiff to suffer emotional distress, humiliation and embarrassment. Defendant's actions were intentional and willful and without regard for the rights of Plaintiff and others similarly situated.

20. Plaintiff is entitled to an award of back pay, compensatory damages, exemplary damages, pre-judgment interest and costs.

FOURTH CAUSE OF ACTION RELIGIOUS DISCRIMINATION

Paragraphs 1-20 are incorporated by reference.

21. As a result of Defendant's discriminatory actions Plaintiff suffered the effects of Discrimination on account of being faithful to the ten commandments and honoring the sabbath day and keeping it holy, which is a violation of Title VII of the Civil Rights Act of 1964, and Sections 102 and 103 of the Civil Rights Act of 1991, as amended.
22. The Actions of Defendant, through its representatives, caused Plaintiff to suffer emotional distress, humiliation and embarrassment. Defendant's actions were intentional and willful and without regard for the rights of Plaintiff and others similarly situated.
23. Plaintiff is entitled to an award of back pay, compensatory damages, exemplary damages, pre-judgment interest and costs.

FIFTH CAUSE OF ACTION NATIONAL ORIGIN DISCRIMINATION

Paragraphs 1-23 are incorporated by reference.

24. As a result of Defendant's discriminatory actions Plaintiff suffered the effects of Discrimination on account of being a different nationality, which is a violation of Title VII of the Civil Rights Act of 1964 as amended.
25. The Actions of Defendant, through its representatives, caused Plaintiff to suffer emotional distress, humiliation and embarrassment. Defendant's actions were intentional and willful and without regard for the rights of Plaintiff and others similarly situated.
26. Plaintiff is entitled to an award of back pay, compensatory damages, exemplary damages, pre-judgment interest and costs.

Wherefore, Plaintiff prays for Judgment against Defendant in an amount in excess of \$10,000.00, for costs of this action, for a Jury trial and for such other relief as the Court deems just and equitable.

Respectfully submitted,


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